



Docket No.: SON-856
(80001-0285)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of:
Yutaka Nakatsu et al.

Confirmation No. 5506

Application No.: 08/610,758

Art Unit: 2612

Filed: March 5, 1996

Examiner: A. S. Moe

For: APPARATUS HAVING MEANS FOR
PRINTING VIDEO SIGNALS OF VIDEO
CAMERA ATTACHED THERETO

REPLY BRIEF

MS Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

INTRODUCTORY COMMENTS

This is a Reply Brief under 37 C.F.R. §41.41 in response to the Examiner's Answer mailed on May 5, 2005.

All arguments presented within the Appeal Brief of May 5, 2005 are incorporated herein by reference. Additional arguments are provided hereinbelow.

Claims 8-26, 28-38 and 40-71 are currently pending in this application, with claims 8, 40, 47, 58 and 65 being independent.

Claim 8

Claim 8 provides for said operation system being incorporated within said printer housing portion, said operation system controlling said camera to select said image for exhibition on said display device as a displayed image, said operation system controlling said printer mechanism to output a physical reproduction of said displayed image.

Claim 8 provides for said camera being removably connectable with said printer housing portion.

The Examiner's Answer contends that camera VTR 201 of U.S. Patent No. 5,926,285 to Takahashi may be disconnected from the housing portion 502, so that the video camera 201 may be used separately (Examiner's Answer at page 17).

In response to this contention, reference 502 of Takahashi is arguably described as a mode selection switch 502 (Takahashi at figure 19B, column 18, lines 7-8) and is not described as a housing portion.

Moreover, nowhere in Takahashi is found the express teaching of a housing portion.

While Takahashi arguably teaches the presence of a printer 203 and a camera VTR 201 (Takahashi at figures 19A and 19B), Takahashi fails to disclose, teach or suggest the camera VTR 201 being removably connectable with a printer housing portion. Instead, figures 19A and 19B depict a fixed connection 428 between the camera VTR 201 and the printer 203.

The assertions made within the Examiner's Answer regarding the removability of camera VTR 201 from the printer 203 is mere hindsight, at least using figures 2 and 4 of the Applicant's specification to fill the gaps that are absent from within Takahashi.

U.S. Patent 5,559,554 to Uekane et al. (Uekane) arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane fails to disclose, teach or suggest the presence of a printer. As a result, Uekane fails to disclose, teach or suggest camera 1 being removably connectable with a printer housing portion.

Claim 8 provides for said camera being adapted to operate separate and apart from said printer.

As noted hereinabove, figures 19A and 19B of Takahashi arguably depict a fixed connection 428 between the camera VTR 201 and the printer 203. The Examiner's Answer contends that the camera VTR 201 can be removed from the printer house as desired (Examiner's Answer at page 17). However, nowhere within Takahashi is found the teaching that the camera VTR 201 can be removed from the printer house as desired.

The assertions made within the Examiner's Answer regarding the removability of camera VTR 201 from the printer 203 is mere hindsight, at least using figures 2 and 4 of the Applicant's specification to fill the gaps that are absent from within Takahashi.

Uekane arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane fails to disclose, teach or suggest the presence of a printer. As a result, Uekane fails to disclose, teach or suggest camera 1 being removably connectable with a printer housing portion.

Claim 18

Within claim 18, said operation system includes a first memory button, said first memory button providing a control to store said image displayed on said display device within a recordable medium of said printer.

Takahashi arguably teaches the presence of a memory unit 231 (Takahashi at figure 19B).

However, Takahashi fails to disclose, teach or suggest an image being stored within the memory unit 231 of the printer 203. Instead, Takahashi arguably teaches that additional data such as image information, the control signal and the date information is temporarily received by the I/F 520 before it is supplied to the memory unit 231 and the system controller 232 (Takahashi at figure 19B, column 17, lines 34-37).

As a result, Takahashi fails to disclose, teach or suggest an operation system includes a first memory button, wherein the first memory button provides a control to store the image displayed on the display device within a recordable medium 231 of the printer 203.

Uekane arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane fails to disclose, teach or suggest the presence of a printer. As a result, Uekane fails to disclose, teach or suggest an operation system includes a first memory button, wherein the first memory button provides a control to store the image displayed on the display device within a recordable medium of a printer.

Claim 19

Within claim 19, said operation system includes a second memory button, said second memory button providing a control to access said image that has been stored within a recordable medium of said printer.

Takahashi arguably teaches the presence of a memory unit 231 (Takahashi at figure 19B).

However, Takahashi fails to disclose, teach or suggest an image being stored within the memory unit 231 of the printer 203. Instead, Takahashi arguably teaches that additional data such as image information, the control signal and the date information is temporarily received by the I/F 520 before it is supplied to the memory unit 231 and the system controller 232 (Takahashi at figure 19B, column 17, lines 34-37).

As a result, Takahashi fails to disclose, teach or suggest an operation system that includes a second memory button, wherein the second memory button provides a control to access the image that has been stored within the memory unit 231 of the printer 203.

Uekane arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane *fails* to disclose, teach or suggest the *presence of a printer*. As a result, Uekane fails to disclose, teach or suggest an operation system that includes a second memory button, wherein the second memory button provides a control to access the image that has been stored within a recordable medium of a printer.

Claims 21-23

Claims 22 and 23 are dependent upon claim 21. Within claim 21, said connector includes a signal input/output terminal and a plurality of guide rails.

The Examiner's Answer admits that Takahashi and Uekane fail to disclose, teach or suggest the use of a plurality of guide rails as recited in the claimed invention (Examiner's Answer at page 25), and cites U.S. Patent 4,507,689 to Kozuki et al. (Kozuki) for the teaching of the plurality of guide rails.

In response, claim 21 is dependent upon claim 8. Claim 8 provides for said printer housing portion having a connector. Within claim 21, said connector of claim 8 includes a signal input/output terminal and a plurality of guide rails.

Kozuki arguably teaches the presence of a video camera 100, a television tuner 200, VTR reproducing equipment 300, and a VTR 500 (Kozuki at figure 1).

However, Kozuki *fails* to disclose, teach or suggest the *presence of a printer*. As a result, Kozuki fails to disclose, teach or suggest a printer housing portion having a connector, wherein the *connector for the printer housing portion* includes a signal input/output terminal and a plurality of guide rails.

Claim 24

The Examiner's Answer argues that the combination of Takahashi, Uekane, and Kozuki shows the input/output terminal (i.e., noted the digital interfaces used in the system of Takahashi) includes at least one contact member, said contact member (i.e., T1 of Kozuki) being in electrical contact with said camera (201/20) to provide power between said video printer (203/14) and said camera (201/20)(column 5, lines 1+ of Kozuki).

In response to this contention, within claim 24, said signal input/output terminal includes at least one contact member, said contact member being in electrical contact with said camera to provide power between said printer and said camera.

Support for this feature is found within the specification as originally filed at, for example, figure 3 and page 5, line 24 regarding contact members 4r and 4s. In particular, the specification as originally filed provides that contact members 4r and 4s are "power supplies".

Takahashi arguably teaches the presence of signals DATA D, CS1, CS2, and CLOCK (Takahashi at figure 19A). In this regard, Takahashi arguably teaches CS1, CS2, and CLOCK as being operation control signals (Takahashi at column 15, lines 42-43). In this regard, Takahashi fails to disclose, teach or suggest CS1, CS2, and CLOCK as being a power supply.

Takahashi arguably teaches that figure 23(b) illustrates data D shown in figure 19 (Takahashi at column 16, line 13). Takahashi also arguably teaches that figure 23(e) illustrates data D shown in figure 19 (Takahashi at column 16, lines 27-28). However, Takahashi fails to disclose, teach or suggest DATA D as being a power supply.

Uekane arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane fails to disclose, teach or suggest the presence of a printer. As a result, Uekane fails to disclose, teach or suggest a contact member in electrical contact with the camera 1 to provide power between a printer and the camera 1.

Kozuki arguably teaches the presence of a video camera 100, a television tuner 200, VTR reproducing equipment 300, and a VTR 500 (Kozuki at figure 1). Kozuki arguably teaches that the D.C. power source 105, built in the camera 100, delivers a high voltage to the picture pick up tube 106 via the high voltage generator 109 and at the same time, current to the power source circuit 514 of the VTR 500 via the terminals T1-1 and T1 (Kozuki at figure 2, column 2, lines 20-25).

However, Kozuki fails to disclose, teach or suggest the presence of a printer. As a result, Kozuki fails to disclose, teach or suggest a contact member in electrical contact with the camera 100 to provide power between a printer and the camera 100.

Claim 41

Within claim 41, said operation system includes a memory for storing said selected picture, said selected picture being stored within said memory before controlling said printer mechanism to output a physical reproduction of said selected picture.

Takahashi arguably teaches the presence of a memory unit 231 (Takahashi at figure 19B).

However, Takahashi fails to disclose, teach or suggest an image being stored within the memory unit 231 of the printer 203. Instead, Takahashi arguably teaches that additional data such as image information, the control signal and the date information is temporarily received by the I/F 520 before it is supplied to the memory unit 231 and the system controller 232 (Takahashi at figure 19B, column 17, lines 34-37).

As a result, Takahashi fails to disclose, teach or suggest an operation system that includes a memory for storing the selected picture, wherein the selected picture is stored within the memory unit 231 before controlling the printer mechanism to output a physical reproduction of the selected picture.

Uekane arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane fails to disclose, teach or suggest the presence of a printer. As a result, Uekane fails to disclose, teach or suggest an operation system that includes a memory for storing the selected picture, wherein the selected picture is stored within memory before controlling a printer mechanism to output a physical reproduction of the selected picture.

Claim 45

Within claim 45, said camera is adapted to operate separate and apart from said printer.

As noted hereinabove, figures 19A and 19B of Takahashi arguably depict a fixed connection 428 between the camera VTR 201 and the printer 203. The Examiner's Answer contends that the camera VTR 201 is inherently known as a Camcorder, thus, the camera VTR 201 is inherently capable of operating apart from the printer 203 (Examiner's Answer at page 6). However, nowhere within Takahashi is found the teaching that the camera VTR 201 can be removed from the printer house.

The assertions made within the Examiner's Answer regarding the removability of camera VTR 201 from the printer 203 is mere hindsight, at least using figures 2 and 4 of the Applicant's specification to fill the gaps that are absent from within Takahashi.

Uekane arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane fails to disclose, teach or suggest the presence of a printer. As a result, Uekane fails to disclose, teach or suggest camera 1 being adapted to operate separate and apart from a printer.

Claim 48

Within claim 48, said operation system includes a memory for storing said selected picture, said selected picture being stored within said memory before controlling said printer mechanism to output a physical reproduction of said selected picture.

Takahashi arguably teaches the presence of a memory unit 231 (Takahashi at figure 19B).

However, Takahashi fails to disclose, teach or suggest an image being stored within the memory unit 231 of the printer 203. Instead, Takahashi arguably teaches that additional

data such as image information, the control signal and the date information is temporarily received by the I/F 520 before it is supplied to the memory unit 231 and the system controller 232 (Takahashi at figure 19B, column 17, lines 34-37).

As a result, Takahashi fails to disclose, teach or suggest an operation system that includes a memory for storing the selected picture, wherein the selected picture is stored within the memory unit 231 before controlling the printer mechanism to output a physical reproduction of the selected picture.

Uekane arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane fails to disclose, teach or suggest the presence of a printer. As a result, Uekane fails to disclose, teach or suggest an operation system that includes a memory for storing the selected picture, wherein the selected picture is stored within memory before controlling a printer mechanism to output a physical reproduction of the selected picture.

Claim 56

Within claim 56, said camera is adapted to operate separate and apart from said printer.

As noted hereinabove, figures 19A and 19B of Takahashi arguably depict a fixed connection 428 between the camera VTR 201 and the printer 203. The Examiner's Answer contends that the camera VTR 201 is inherently known as a Camcorder, thus, the camera VTR 201 is inherently capable of operating apart from the printer 203 (Examiner's Answer at pages 6 and 10). However, nowhere within Takahashi is found the teaching that the camera VTR 201 can be removed from the printer house.

The assertions made within the Examiner's Answer regarding the removability of camera VTR 201 from the printer 203 is mere hindsight, at least using figures 2 and 4 of the Applicant's specification to fill the gaps that are absent from within Takahashi.

Uekane arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane fails to disclose, teach or suggest the presence of a printer. As a result, Uekane fails to disclose, teach or suggest camera 1 being adapted to operate separate and apart from a printer.

Claim 59

Within claim 59, said printer includes a memory for storing said selected picture, said selected picture being stored within said memory before controlling said printer mechanism to output a physical reproduction of said selected picture.

Takahashi arguably teaches the presence of a memory unit 231 (Takahashi at figure 19B).

However, Takahashi fails to disclose, teach or suggest an image being stored within the memory unit 231 of the printer 203. Instead, Takahashi arguably teaches that additional data such as image information, the control signal and the date information is temporarily received by the I/F 520 before it is supplied to the memory unit 231 and the system controller 232 (Takahashi at figure 19B, column 17, lines 34-37).

As a result, Takahashi fails to disclose, teach or suggest an operation system that includes a memory for storing the selected picture, wherein the selected picture is stored within the memory unit 231 before controlling the printer mechanism to output a physical reproduction of the selected picture.

Uekane arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane fails to disclose, teach or suggest the presence of a printer. As a result, Uekane fails to disclose, teach or suggest an operation system that includes a memory for storing the selected picture, wherein the selected picture is stored within memory before controlling a printer mechanism to output a physical reproduction of the selected picture.

Claim 63

Within claim 63, said camera is adapted to operate separate and apart from said printer.

As noted hereinabove, figures 19A and 19B of Takahashi arguably depict a fixed connection 428 between the camera VTR 201 and the printer 203. The Examiner's Answer contends that the camera VTR 201 is inherently known as a Camcorder, thus, the camera VTR 201 is inherently capable of operating apart from the printer 203 (Examiner's Answer at pages 6 and 12). However, nowhere within Takahashi is found the teaching that the camera VTR 201 can be removed from the printer house.

The assertions made within the Examiner's Answer regarding the removability of camera VTR 201 from the printer 203 is mere hindsight, at least using figures 2 and 4 of the Applicant's specification to fill the gaps that are absent from within Takahashi.

Uekane arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane fails to disclose, teach or suggest the presence of a printer. As a result, Uekane fails to disclose, teach or suggest camera 1 being adapted to operate separate and apart from a printer.

Claim 66

Within claim 66, said printer includes a memory for storing said selected picture, said selected picture being stored within said memory before controlling said printer mechanism to output a physical reproduction of said selected picture.

Takahashi arguably teaches the presence of a memory unit 231 (Takahashi at figure 19B).

However, Takahashi fails to disclose, teach or suggest an image being stored within the memory unit 231 of the printer 203. Instead, Takahashi arguably teaches that additional

data such as image information, the control signal and the date information is temporarily received by the I/F 520 before it is supplied to the memory unit 231 and the system controller 232 (Takahashi at figure 19B, column 17, lines 34-37).

As a result, Takahashi fails to disclose, teach or suggest an operation system that includes a memory for storing the selected picture, wherein the selected picture is stored within the memory unit 231 before controlling the printer mechanism to output a physical reproduction of the selected picture.

Uekane arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane fails to disclose, teach or suggest the presence of a printer. As a result, Uekane fails to disclose, teach or suggest an operation system that includes a memory for storing the selected picture, wherein the selected picture is stored within memory before controlling a printer mechanism to output a physical reproduction of the selected picture.

Claim 70

Within claim 70, said camera is adapted to operate separate and apart from said printer.

As noted hereinabove, figures 19A and 19B of Takahashi arguably depict a fixed connection 428 between the camera VTR 201 and the printer 203. The Examiner's Answer contends that the camera VTR 201 is inherently known as a Camcorder, thus, the camera VTR 201 is inherently capable of operating apart from the printer 203 (Examiner's Answer at pages 6 and 15). However, nowhere within Takahashi is found the teaching that the camera VTR 201 can be removed from the printer house.

The assertions made within the Examiner's Answer regarding the removability of camera VTR 201 from the printer 203 is mere hindsight, at least using figures 2 and 4 of the Applicant's specification to fill the gaps that are absent from within Takahashi.

Uekane arguably teaches a monitor screen-integrated video camera having a camera portion 1 and a monitor portion 2 (Uekane at figure 7).

However, Uekane *fails* to disclose, teach or suggest the *presence of a printer*. As a result, Uekane fails to disclose, teach or suggest camera 1 being adapted to operate separate and apart from a printer.

Conclusion

The prior art of record, either individually or as a whole, fails to disclose, teach or suggest all the features of the claimed invention. For at least the reasons set forth hereinabove, the rejection of the claimed invention should not be sustained.

Therefore, a reversal of the rejection of October 14, 2004 is respectfully requested.

If any fee is required or any overpayment made, the Commissioner is hereby authorized to charge the fee or credit the overpayment to Deposit Account # 18-0013.

Dated: July 5, 2005

Respectfully submitted,

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